

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

UNITED STATES OF AMERICA,	:	CASE NO. 1:21-CR-017
	:	
Plaintiff,	:	JUDGE COLE
	:	
RYAN CARTER,	:	DEMAND FOR DISCOVERY
	:	
Defendant,	:	

Defendant, through his attorney, pursuant to Federal Rule of Criminal Procedure 16,
hereby demands that the prosecuting attorney:

1. Permit the Defendant:
 - (a) to inspect and copy or photograph any of the following which are available to, or within the possession, custody, or control of the state, the existence of which is known or by the exercise of due diligence may become known to the prosecuting attorney:
 - (i) relevant written or recorded statements by the Defendant or Co-Defendant, or copies thereof;
 - (ii) written summaries of any oral statement, or copies thereof, made by the Defendant or Co-Defendant to the prosecuting attorney or any law enforcement officer;
 - (iii) recorded testimony of the Defendant or Co-Defendant before a grand jury;
 - (b) to inspect and copy or photograph books, papers, audio and video tape recordings, documents, photographs, tangible objects, buildings or places or copies or portions thereof, available to or within the possession, custody or control of the State, and which are material to the preparation of his defense, or are intended for use by the prosecuting attorney as evidence at the trial or were obtained from or belong to the Defendant
 - (c) to inspect and copy or photograph any results or reports or physical or mental examinations and of scientific tests or experiments made in

connection with the particular case, or copies thereof, available to or within the possession, custody or control of the State, the existence of which is known or by the exercise of due diligence may become known to the prosecuting attorney.

- (2) Furnish Defendant:
 - (a) a copy of the Defendant's prior criminal records, which is available to or within the possession, custody or control of the State;
 - (b) a written list of the names and addresses of all witnesses whom the prosecuting attorney intends to call at trial, together with any record of prior felony convictions of any such witnesses or other impeachment material: promises of leniency or immunity for witnesses, which record is within the knowledge of the prosecuting attorney.
- (3) Disclose the counsel for the Defendant all evidence, known or which may become known to the prosecuting attorney, favorable to the Defendant and material either to guilt or punishment.

Respectfully Submitted,

/s/: Clyde Bennett II

Clyde Bennett, II (Supreme Court No. 0059910)

119 E. Court Street

Cincinnati, OH 45202

Direct Phone: (513) 233-5555

Office Phone: (513) 632-9503

Fax: (513) 721-5824

Email: clyde@clydebennettthelaw.com

Website: www.clydebennettthelaw.com

Attorney for Defendant

Ryan Carter

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon the Assistant United States Attorney by electronically filing the foregoing with Clerk of Court by using the CM/ECF system which will send notification of such filing to the above.

/s/: Clyde Bennett II